

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi, U.S.D.J.

v. : Crim. No. 19-877

MATTHEW BRENT GOETTSCHE, :

Defendant. :

THIRD FORFEITURE BILL OF PARTICULARS

The United States of America, by and through Rachael A. Honig, Acting United States Attorney for the District of New Jersey (Sarah Devlin, Assistant U.S. Attorney, appearing), submits this Second Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, to restate, supplement, and clarify the forfeiture allegations contained in the Indictment, Crim. No. 19-877, and to provide notice to defendant Matthew Brent Goetsche of specific property the Government intends to forfeit upon conviction.

1. The allegations set forth in the Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Property subject to forfeiture in this case to the United States, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), includes, but is not limited to the property listed in the schedule attached hereto as Exhibit A.

This notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Dated: Newark, New Jersey
July 22, 2021

Rachael A. Honig
Acting United States Attorney

By: *s/ Sarah Devlin*
Sarah Devlin
Assistant United States Attorney

EXHIBIT A

- 1) All right, title, and interest of defendant Matthew Brent Goetsche, Tracy Island Limited, Hatchet Caye Limited, Dalmoni Belize Ltd., Caye Villa Development Limited, Marbington Limited, Getch Brothers LLC, Reel Men Stuart LLC, Reel Men Deerfield LLC, Reel Men Destin LLC, Ram Land LLC, MV Holdings LLC, El Pequeno Universo SA, MDBA Land Partnership Trust, Getch Stone LLC, AZ Life LLC, and LV Life LLC, in the following real property:
 - a) real property referred to as Hatchet Caye located twenty miles off the Placencia peninsula in the Stann Creek District of Belize (currently referred to as Ray Caye), which is owned by Tracy Island Limited through its ownership of Hatchet Caye Limited;
 - b) an office building in the town of Placencia, Belize, with legal parcel ID number 36-61-1761, which is owned by Tracy Island Limited through its ownership of Hatchet Caye Limited;
 - c) a private island referred to as Mojo Caye located 12.5 miles off the coast of Belize, which is owned by Tracy Island Limited through its ownership of Hatchet Caye Limited, which wholly owns Dalmoni Belize Ltd., which wholly owns Caye Villa Development Limited;
 - d) a real estate development on the Belize mainland called Wild Orchid, located along Placencia Road, Placencia, in the Stann Creek District of Belize, specifically, (1) parcels 119, 120, 121, 122, 123 and 3041, Block 36, Placentia North Registration Section; (2) parcels 1600, 1602, 1605, 3495, 3496, 3497, 3498, 3499, 3501, 3502, 3503 and 3505, Block 36, Placentia North Registration Section. Parcel 1605 was to be subdivided into 14 new lots, 1604-1 to 1604-14; and (3) 8.35 acres of land known as Southern Mojo Water Cay or Quashie Trapp's Caye 14 miles east of Placencia Village, Stann Creek District, which is owned by Tracy Island Limited through its ownership of Hatchet Caye Limited, which wholly owns Dalmoni Belize Ltd., which wholly owns Marbington Limited;
 - e) the fractional ownership (Period B and Period C) of St. Kitts Timeshare Condominium Unit Number 117B, Windswept Residence Club, Christophe Harbor, St. Kitts;
 - f) real property referred to as Casa Colonia House located in Tamarindo Beach, Santa Cruz, Guanacaste, Costa Rica;

- g) real property located at 2435 W. Bridle Meadow Circle, Bluffdale, Utah, 84065, assessor's parcel number 33-04-477-016-0000, which is owned by Getch Brothers LLC;
- h) real property located at 218 SW Federal Highway, Stuart, Florida, 34994, assessor's parcel number 053841011005000606, which is owned by Reel Men Stuart LLC;
- i) real property located at 2054 NE 2nd Street, Deerfield Beach, Florida, 33441, assessor's parcel number 48-43-05-04-0210, which is owned by Reel Men Deerfield LLC;
- j) proceeds of sale of real property located at 111 Harbor Boulevard, Destin, Florida which had been owned by Reel Men Destin LLC;
- k) real property located at 4381 W. Flamingo Road, 5901, Unit 59301, Las Vegas, Nevada, 89103, assessor's parcel number 162-19-511-599, which is owned by RAM Land LLC;
- l) real property located at Country Club Drive, Mountainview, Colorado more specifically described as Lot 126R, Lot 152R, Tract OSP-118 and Tract OSP-126, Telluride Mountain Village, as shown on a replat of lots 118, 126, 130, 152A, 152B, 152C and Tract OS-1, Town of Mountain Village in San Miguel County, Colorado, assessor's parcel numbers 456534301029 and 456534301032, which is owned by MV Holdings LLC;
- m) real property located in the Jaco District of Costa Rica, at eleven Garabito Canton, province of Puntarenas, registration number 194724, Cadaster map number 159250-2012, which is owned by El Pequeno Universo SA;
- n) real property located in the Jaco District of Costa Rica, Garbarito Canton, province of Puntarenas, property number 56440-F-000, which is owned by El Pequeno Universo SA;
- o) real property located at 3791 63rd Street, Boulder, Colorado, assessor's parcel number 1463-23-0-00-034, which is owned by MDBA Land Partnership Trust;
- p) real property located at 2209 Stonehenge Circle, Lafayette, Colorado, assessor's parcel number R0036849, which is owned by Getch Stone LLC;
- q) real property located at 9222 East Rimrock Drive, Scottsdale, Arizona, 85255, assessor's parcel number 217-12-111, which is owned by AZ Life LLC; and

- r) real property located at 4381 W. Flamingo Road, 5508, Unit #55308, Las Vegas, Nevada, 89103, assessor's parcel number 16219511583, which is owned by LV Life LLC.
- 2) All right, title, and interest of defendant Matthew Brent Goettsche in the following legal entities:
 - a) Tracy Island Limited;
 - b) Hatchet Caye Limited;
 - c) Dalmoni Belize Ltd.;
 - d) Caye Villa Development Limited;
 - e) Marbington Limited;
 - f) Getch Brothers LLC;
 - g) Reel Men Stuart LLC;
 - h) Reel Men Deerfield LLC;
 - i) Reel Men Destin LLC;
 - j) RAM Land LLC;
 - k) MV Holdings LLC;
 - l) El Pequeno Universo SA;
 - m) MDBA Land Partnership Trust;
 - n) Getch Stone LLC;
 - o) AZ Life LLC; and
 - p) LV Life LLC.
- 3) All right, title, and interest of defendant Matthew Brent Goettsche's and Hatchet Caye Limited in the following property:
 - a) 2007 Sea Ray 58 foot yacht model DB with a Hull identification number of SERY1409F607:

4) All right, title, and interest of defendant Matthew Brent Goettsche, GoBit LLC, Bitwealth Holdings LLC, Bitwealth Investments, Inc., Bitwealth Oil & Gas LLC, Reel Men LLC, Getch Holdings LLC and Hard Fork Holdings LLC in the legal entities listed below, and/or their subsidiaries, affiliates, and joint ventures, generated by investments made by defendant Matthew Brent Goettsche, GoBit LLC, Bitwealth Holdings LLC, Bitwealth Investments, Inc., Bitwealth Oil & Gas LLC, Reel Men LLC Getch Holdings LLC, and Hard Fork Holdings LLC, including the assets of the legal entities, the investment principal, and equity interests generated by the investment:

- a) GoBit LLC's investment in a business venture named Turnkey Pads LLC in the amount of \$375,000;
- b) Bitwealth Holdings LLC's investment in a business venture named Societi LLC in the amount of \$1.1 million;
- c) Reel Men LLC's investment in a business venture named Pelagic Group (including Pelagic Inc., Pelagic Ventures LLC, Pelagic Retail LLC, Pelagic Adventures LLC, and Ocean Lifestyles LLC) in the amount of \$6 million;
- d) Bitwealth Holdings LLC's investment in a business venture named Grid Entertainment in the amount of \$1.6 million;
- e) Bitewalth Holdings LLC's investment in a business venture named Evermore Park LLC in the amount of \$500,000;
- f) GoBit LLC's investment in a business venture named ConveyIQ, Inc in the amount of \$876,166;
- g) Bitwealth Oil & Gas LLC's investment in a business venture named Seeker Resources LLC in the amount of \$5.5 million;
- h) Bitwealth Holdings LLC's investment in a business venture named Daffinity Technologies, Inc. in the amount of \$821,395;
- i) Bitwealth Holdings LLC's investment in a business venture named Opiniion, LLC in the amount of \$750,000;
- j) Bitwealth Holdings LLC's investment in a business venture named Bountiful Flight, LLC in the amount of \$1,225,000;
- k) Bitwealth Holdings LLC and Bitwealth Investments LLC's investment in a business venture named Educational Insurance Company/7Nine Inc. in the amount of \$2.65 million;

- 1) Bitwealth Holdings LLC's investment in a business venture named ApiO Inc. in the amount of \$3 million;
- m) Getch Holdings LLC's investment in a business venture named SoCal Building Ventures LLC in the amount of \$3 million;
- n) Bitwealth Investments LLC's investment in a business venture named Kiln LLC in the amount of \$8.4 million; and
- o) Hard Fork Holdings LLC's investment in assets of Cryptowatt Mining, LLC and Cryptowatt Investment Partners, LLC, including land, buildings and digital currency mining revenues.

- 5) The proceeds due on the loans, promissory notes, receivables, security, or financing arrangement, or other contribution, by or from, directly or indirectly, defendant Matthew Brent Goetsche, Hard Fork Holdings LLC, GoBit LLC, and Bitwealth Holdings LLC, listed below:
 - a) the principal sum of \$8.75 million transferred to or for the benefit of Burrell Diversified Investments, LLC from Hard Fork Holdings LLC, with interest accruing from December 7, 2018;
 - b) the principal sum of \$500,000 transferred to or for the benefit of BPA LLC from GoBit LLC, with interest accruing from December 31, 2018;
 - c) the principal sum of \$500,000 transferred to or for the benefit of Stephen Mathew Morrow from Matthew Brent Goetsche with interest accruing from July 2, 2019; and
 - d) the combined principal sum of \$5 million transferred to or for the benefit of Bluemountain VII LLC from Bitwealth Holdings LLC with interest accruing from the following dates and for respective transfer amounts, (1) \$1 million on April 26, 2018; (2) \$2 million on May 18, 2018; (3) \$1 million on September 10, 2018; and (4) \$1 million on November 1, 2018.
- 6) All right, title, and interest of defendant Matthew Brent Goetsche and MDBA Land Partnership Trust in the following accounts and all property traceable thereto, directly and indirectly, including but not limited to, cash and monetary instruments, the contents of any financial institution accounts to which such funds and other property have been transferred, and property and interests in property purchased in whole or in part, directly and indirectly, with such funds:

- a) the balance of currency held by AU Card LLC in the name of Russ Albert Medlin;
- b) the balance of currency held by AU Card LLC in the name of defendant Matthew Brent Goettsche;
- c) the balance of collateral held by AU Card LLC, plus accrued interest, in connection with loans to GoBit LLC; and
- d) currency held in an account at RBC Wealth Management in the name of MDBA Land Partnership Trust.

7) All of defendant Matthew Brent Goettsche's rights, title, and interest in the following specific digital currency:

- a) digital currency transferred from nine digital wallets originally held at Blockchain.com, specifically, 53.4 bitcoins and 9389.36 ether.